

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

HELEN A. RUNGE,	:	
	:	
Plaintiff	:	
	:	
v.	:	CA No. 05-10849-RGS
	:	
WALTER J. KELLY; KERRY L.	:	
BLOOMINGDALE, M.D.; and	:	
SUNBRIDGE NURSING AND	:	
REHABILITATION CENTER,	:	
	:	
Defendants	:	

PLAINTIFF'S ASSENTED-TO MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT'S MOTION TO TRANSFER
CLAIMS AGAINST HIM TO MASSACHUSETTS SUPERIOR COURT
FOR LIMITED PURPOSE OF CONVENING A MEDICAL MALPRACTICE TRIBUNAL

Plaintiff Helen A. Runge, by her counsel, hereby moves this Court for a 1-week extension of time to file a reply to the Motion of the Defendant Kerry L. Bloomingdale, M.D. ("Defendant Bloomingdale") to Transfer the Claims Against Him to Massachusetts Superior Court ("Motion to Transfer") from June 20, 2005 to June 27, 2005. As grounds therefore, the plaintiff states as follows:

1. Defendant Bloomingdale served the Motion to Transfer on May 31, 2005.

2. Defendant Bloomingdale, through inadvertent oversight, did not serve the Motion on undersigned counsel, local counsel of record. Undersigned counsel received this Motion for the first time on or about June 15, 2005.

3. The additional time is necessary to prepare and file the Plaintiff's Opposition in light of the position taken by Defendant Bloomingdale's counsel during a Local Rule 7.1 Conference, held on or about June 16, 2005.

4. Defendant Bloomingdale has provided his assent, through counsel, to this Motion.

5. All parties who have filed an appearance in this action have assented to this Motion.

6. The extension will not prejudice the other parties to this action as they have yet to appear or otherwise defend the allegations in this action.

WHEREFORE, plaintiff Helen A. Runge moves this Court for an extension until June 27, 2005 to file her response to Defendant's Motion.

Dated: June 20, 2005

Respectfully submitted,

/s/ Blake J. Godbout
Blake J. Godbout, BBO #196380
BLAKE J. GODBOUT & ASSOCIATES
33 Broad Street, 11th Floor
Boston, MA 02109
(617) 523-6677

Glenn R. Davis
LATSHA, DAVIS, YOHE & McKENNA
P.O. Box 825
Harrisburg, PA 17108

Attorneys for Plaintiff

LOCAL RULE 7.1 CERTIFICATE

I, Blake J. Godbout, counsel for plaintiff Helen A. Runge, certify that I have spoken with James S. Hamrock, Jr., Esq., Hamrock & Tocci, counsel for Defendant Kerry L. Bloomingdale, M.D., and with Michele Carlucci, Esq., Wilson, Elser, Moskowitz, Edelman & Dicker LLP, counsel for Defendant Walter J. Kelly, regarding the within Motion For Extension of Time to Reply. Attorneys Hamrock and Carlucci both stated that they assent to this motion.

Dated: June 20, 2005

/s/ Blake J. Godbout
Blake J. Godbout

CERTIFICATE OF SERVICE

I, Blake J. Godbout, hereby certify that a true copy of the above document was served upon the attorney of record for each party by first class mail, postage prepaid, on June 20, 2005.

/s/ Blake J. Godbout
Blake J. Godbout